

February 21, 2019
Via US ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Vero Fiber Networks, LLC
Form 499 Filer ID: 832281
Annual Customer Proprietary Network Information Compliance Certification;
EB Docket No. 06-36

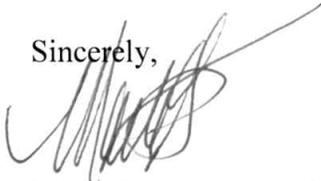
Dear Ms. Dortch,

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI")
Compliance Certification; EB Docket No. 06-36, filed on behalf of Vero Fiber Networks, LLC.

Please do not hesitate to contact me at 407-260-1011 or mark@csilongwood.com if you have any
questions or concerns.

Thank you for your assistance in processing this filing.

Sincerely,



Mark G. Lammert, CPA
Tax Preparer for Vero Fiber Networks, LLC

Cc: Vero Fiber Networks, LLC
File: Vero Fiber Networks, LLC - PUC - FCC

**STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. Vero Fiber Networks, LLC (hereafter referred to as “Vero Fiber Networks”) is a competitive telecommunications carrier currently certificated to provide services in 14 states. Vero Fiber Networks primarily provides bandwidth infrastructure services to schools and libraries under the federal E-Rate Program. As such, Vero Fiber Networks has very limited access to end user customer proprietary network information (“CPNI”). Nevertheless, it is Vero Fiber Networks policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer’s consent prior to using CPNI.
2. Vero Fiber Networks follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Vero Fiber Networks. However, Vero Fiber Networks cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - A. If an unauthorized disclosure were to occur, Vero Fiber Networks shall provide notification of the breach within seven (7) days to the United States Secret Service (“USSS”) and the Federal Bureau of Investigation (“FBI”).
 - B. Vero Fiber Networks shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
 - C. Notwithstanding the provisions in subparagraph B above, Vero Fiber Networks shall not wait the additional seven (7) days to notify its customers if Vero Fiber Networks determines there is an immediate risk of irreparable harm to the customers.
 - D. Vero Fiber Networks shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.
 - A. Specifically, Vero Fiber Networks shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
 1. When the customer has pre-established a password.

2. When the information requested by the customer is to be sent to the customer's address of record, or
 3. When Vero Fiber Networks calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.
- B. Vero Fiber Networks may use CPNI for the following purposes:
- To initiate, render, maintain, repair, bill and collect for services;
 - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive , or the unlawful use of, or subscription to, such services;
 - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
 - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
 - To market services formerly known as adjunct-to-basic services; and
 - To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.
4. Prior to allowing access to Customers' individually identifiable CPNI to Vero Fiber Networks' joint venturers or independent contractors, Vero Fiber Networks will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent from a customer prior to disclosing the information. In addition, Vero Fiber Networks requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.
 5. Vero Fiber Networks requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.
 6. Vero Fiber Networks does not market, share or otherwise sell CPNI information to any third party.
 7. Vero Fiber Networks maintains a record of its own and its affiliates' sales and marketing campaigns that use Vero Fiber Networks' customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- A. Prior commencement of a sales or marketing campaign that utilizes CPNI, Vero Fiber Networks establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by Vero Fiber Networks.

- Prior to any solicitation for customer approval, Vero Fiber Networks will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
 - Vero Fiber Networks will use opt-in approval for any instance in which Vero Fiber Networks must obtain customer approval prior to using, disclosing, or permitting access to CPNI.
 - A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
 - Records of approvals are maintained for at least one year.
 - Vero Fiber Networks provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
 - The content of Vero Fiber Networks' CPNI notices comply with FCC rule 64.2008 (c).
8. Vero Fiber Networks has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
 9. Vero Fiber Networks has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, Vero Fiber Networks' sales personnel will obtain express approval of any proposed outbound marketing request for customer approval of the use of CPNI by The General Counsel of Vero Fiber Networks.
 10. Vero Fiber Networks notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
 11. Vero Fiber Networks may negotiate alternative authentication procedures for services that Vero Fiber Networks provides to business customers that have a dedicated account representative and a contract that specifically addresses Vero Fiber Networks' protection of CPNI.
 12. Vero Fiber Networks is prepared to provide written notice within five business days to the FCC of any instance where the opt-in mechanisms do not work properly to such a degree that consumer's inability to opt-in is more than an anomaly.

ANNUAL 47 C.F.R. S: 64.2009 (e) CPNI CERTIFICATION FOR 2019
EB Docket 06-36

Date Filed: February 21, 2019
Name of Company: Vero Fiber Networks, LLC
Form 499 Filer ID: 832281
Name of Signatory: Gregg Strumberger
Title of Signatory: Chief Legal Officer

I, Gregg Strumberger, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. &64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____


Gregg Strumberger
Chief Legal Officer